

DAVID J. BERGER, State Bar No. 147645
CATHERINE E. MORENO, State Bar No. 264517
THOMAS J. MARTIN, State Bar No. 150039
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
650 Page Mill Road
Palo Alto, CA 94304-1050
Telephone: (650) 493-9300
Facsimile: (650) 565-5100
Email: tmartin@wsgr.com

PAUL CHAVEZ, State Bar No. 241576
ROBIN GOLDFADEN, State Bar No. 208055
LAWYERS' COMMITTEE FOR CIVIL RIGHTS
131 Steuart Street, Suite 400
San Francisco, CA 94105
Telephone: (415) 543-9444
Facsimile: (415) 543-0296
Email: pchavez@lccr.com

JULIA HARUMI MASS, State Bar No. 189649
JINGNI (JENNY) ZHAO, State Bar No. 284684
ALAN L. SCHLOSSER, State Bar No. 49957
AMERICAN CIVIL LIBERTIES UNION FOUNDATION
OF NORTHERN CALIFORNIA, INC.
39 Drumm Street
San Francisco, CA 94111
Telephone: (415) 621-2493
Facsimile: (415) 255-8437
Email: jmass@aclunc.org

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UELIAN DE ABADIA-PEIXOTO, *et al.*,
 Plaintiffs,
 v.
 UNITED STATES DEPARTMENT OF
 HOMELAND SECURITY, *et al.*,
 Defendants.

Case No.: 3:11-cv-4001 RS
CLASS ACTION
**DECLARATION OF JULIA HARUMI
 MASS IN SUPPORT OF PLAINTIFFS’
 UNOPPOSED NOTICE OF MOTION,
 MOTION, AND MEMORANDUM OF
 POINTS AND AUTHORITIES IN
 SUPPORT OF PRELIMINARY APPROVAL
 OF CLASS ACTION SETTLEMENT**
 Date: January 23, 2014
 Time: 1:30 p.m.
 Judge: Honorable Richard Seeborg
 Ctrm: 3, 17th Floor

- 1 -

1 I, Julia Harumi Mass, declare:

2 1. I am a Staff Attorney with the American Civil Liberties Union Foundation of
3 Northern California (“ACLU of Northern California”) in San Francisco, California, co-counsel
4 for Plaintiffs Uelian De Abadia-Peixoto, Esmar Cifuentes, Pedro Nolasco Jose, and Mi Lian Wei
5 in this action. I submit this declaration in support of Plaintiffs’ Unopposed Notice of Motion,
6 Motion, and Memorandum of Points and Authorities in Support of Preliminary Approval of
7 Class Action Settlement. The following facts are based on my personal knowledge and, if called
8 to testify to these facts, I could and would testify competently thereto.

9 2. I have been a member of the California bar with an active litigation practice since
10 1997. I graduated from UCLA School of Law in 1996. After graduation, I served as a judicial
11 clerk to the Honorable Warren J. Ferguson on the Ninth Circuit Court of Appeals. From 1997 to
12 2003 I was an associate at the Pasadena law firm, Rothner, Segall & Greenstone, and I joined the
13 staff of the ACLU of Northern California in April 2003.

14 3. The ACLU of Northern California is the largest regional affiliate of the American
15 Civil Liberties Union and is dedicated to the defense and promotion of the guarantees of liberty
16 and individual rights embodied in the federal and state constitutions. The ACLU of Northern
17 California has extensive expertise in class action and other impact litigation and has participated
18 in numerous cases in federal court that involve policies and practices of the federal immigration
19 system. The ACLU of Northern California has also been involved in local, state, and federal
20 advocacy related to immigration enforcement policy.

21 4. As a staff attorney at the ACLU of Northern California, I regularly litigate civil
22 rights cases on behalf of plaintiffs in the Northern District of California. I have litigated
23 numerous cases against federal agencies, including three that named Immigration and Customs
24 Enforcement as a defendant.

25 5. My colleagues and I have recorded significant time to this action. For example, I
26 have recorded approximately 740 hours to this action since 2011. Pursuant to statutory
27 maximum hourly rates (adjusted for increases in the cost of living) of \$180.59, \$184.32, and
28 \$186.55 for 2011, 2012, and 2013 (first half) under the Equal Access to Justice Act, as provided

1 by the United States Court of Appeals for the Ninth Circuit, this recorded time corresponds to a
2 total of approximately \$130,070. This amount excludes time recorded by five other attorneys
3 and staff at the ACLU of Northern California and filing, transportation and other costs associated
4 with this action.

5 6. It has been and remains my general practice to keep contemporaneous records for
6 all time billed to clients and to enter all of my time for a particular client, on a particular day, in a
7 single entry for the client on that date. It is also my practice to include sufficient detail in my
8 time entries to inform the client as to the nature of the services I performed for them. I followed
9 these billing practices throughout this case. My bills reflected no more than the time actually
10 spent, and in many cases actually reflect less time than I spent.

11 7. In negotiating the settlement of this action, the issue of fees was not negotiated
12 until after the parties had reached an agreement in principle on the substantive aspects of the
13 settlement.

14 I declare under penalty of perjury that the foregoing is true and correct to the best of my
15 knowledge. This declaration was executed on this 19th day of December, 2013, in San
16 Francisco, California.

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18 /s/ Julia Harumi Mass
19 Julia Harumi Mass
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